

## **REMARKS**

The Official Action sets forth a rejection of claims 1, 5, and 10. Specifically, the Examiner has stated that the term “couplable” should be changed to “coupled”. Applicant has made the change as suggested.

The Official Action also sets forth a rejection of claims 41 to 43 under 35 U.S.C. 112. Applicant has canceled these claims without prejudice.

As such, Applicant believes that the provisions of 35 U.S.C. 112 are fully satisfied.

The Official Action has rejected claims 1, 3, 5-9, 11, 13, 15-19, 21, 23, 25-29, 31, 33, 35-38, and 40 as being unpatentable over U.S. Patent No. 5,878,130 to Andrews et al., under 35 U.S.C. 102(b). Applicant has amended claims 1, 11, 14, 21, and 31 to include the limitation that the plurality of access nodes are selected from a group consisting of a digital instrument, an analog instrument, a digital trunk and an analog trunk. As such, amended claims 1, 11, 14, 21, and 31, and their corresponding dependent claims are novel over Andrews. The dependent claims are allowable at least by virtue of their dependence from allowable independent claims. These dependent claims also define further distinguishing characteristics associated with the claimed system and method. Thus, the rejection of claims 1, 3, 5-9, 11, 13 15-19, 21, 23, 25-29, 31, 33, 35-38, and 40 under 35 U.S.C. 102(b) is hereby overcome, as Andrews does not teach each and every element of the afore-mentioned claims.

The Official Action has also rejected claims 2, 10, 12, 20, 22, 30, 32 and 39 as being unpatentable over Andrews in view of Darland et al, US 2003/0128698, under 35 U.S.C. 103(a). In light of the amendments to claims 1, 11, 14, 21, and 31, as stated above, Applicant respectfully submits that claims 2, 10, 12, 20, 22, 30, 32 and 39 are patentable over Andrews and Darland, as a combination of these two references does not teach the claimed subject matter. More specifically, these teachings would not have led a person of skill in the art to have interconnected call centers using a WAN interface to provide calling services to subscribers via digital instruments, analog instruments, analog trunks and digital trunks. Applicant respectfully submits that these claims are indeed non-

obvious and patentable over the teachings of Andrews and Darland, and therefore the rejection of claims 12, 10, 12, 20, 22, 30, 32 and 39 under 35 U.S.C. 103(a) is hereby traversed.

The Official Action has also rejected claims 4, 14, 24 and 34 as being unpatentable over Andrews in view of Sonesh et al, US Patent No. 6,614,783, under 35 U.S.C. 103(a).

Andrews discloses access nodes as being interfaced with a public network (long distance carrier) via SS7 or TCP/IP networks (col. 5, lines 21 – 27), and the long distance carrier interfaces 38, 40, 42 interfacing the controller 30 to the public networks 12, 14, and 16. The agents 482' are connected to the switching matrix 506 via the telephony interface means 68' and the public network (col. 14, lines 30 – 33). A routing engine 48 of the controller 30 routes calls though public network systems to the agent systems. It is quite clear that the access nodes are not interfaced with the switching matrix 506, as in the present invention.

Meanwhile, Sonesh attempts to solve the problem of allowing access to a multimedia ACD via data networks (col. 2, lines 60 -62). However, Sonesh teaches against routing and re-routing of inbound and outbound calls based on circuit switching (col. 1, lines 55 -56). Sonesh also teaches against integrating traditional telephone switching technology utilizing circuit switching with information systems (col. 2, lines 10 -13). Sonesh proposes implementing a call center exchange (MMACD server 110) with packet switching technology (col. 4 lines 7 – 10). The MMACD server 110 digitizes all audio traffic arriving from PSTN via a suitable A/D conversion board, and sends the digital audio data to the call center via the data network. All the intelligence, such as, routing is resident in the MMACD server.

It is thus clear that there is nothing that would compel a person of ordinary skill in the art to combine the teachings of Andrews and Sonesh in order to arrive at the present invention, recited in claims 4, 14, 24 and 34, as these two references teach completely diverging approaches for call centers. More specifically, Sonesh teaches against using

circuit-switching in call center systems, while circuit-switching is promoted in Andrews and the present invention. As such, Applicant believes that claims 4, 14, 24 and 34 are inventive over the teachings of Andrews and Sonesh, and so the rejection of claims 4, 14, 24 and 34, under 35 USC 103(a), is traversed.

Claims 15 and 17 has been amended to correct a typographical error.

No new subject matter has been added by these amendments.

Based on the foregoing, it is respectfully urged that all pending claims in this application are allowable.

Favorable action is respectfully requested.

December 1, 2008  
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